

I am opposed this rule to the extent that it requires Certified flight Instructors to perform the enforcement duties identified in Rule 1552 herein. Why should a CFI be required to do TSA's job? TSA has the responsibility to ensure that aliens are not a threat to the US during flight training activities. If they are aliens then there SHOULD have been a investigation done BEFORE they came to the USA.

TSA should set up a 'Trusted alien' program to anyone who wants flight training and simply issue them an ID card. This ID card, renewable every 2 years [example time period], means that TSA and its' law enforcement arm, has done the necessary criminal background inspection to ensure that this person is not a threat. Then, there is simply no flight instruction without the photo ID card.

Why are we moving the enforcement and investigation requirements OUT of TSA and placing on untrained CFI's who will be required to do all this paperwork? Who pays the CFI for this time? Who compensates the CFI for the cameras and tracking systems and all else which is required?? National Security is not a task that should be placed on the shoulders of in some cases 19-25 year old high school graduates -if TSA wants foreign student pilots screened then TSA Should do it.

WHY does TSA simply not do its' job? If TSA anticipated performing background checks once the flight instructor gathers all this paperwork, why not do it in advance and issue the ID card and simply prohibit flight instruction without 1) proof of US citizenship or 2) the Alien flight Registration Card.

Since TSA has to do the check in ANY case, why is TSA placing the burden on the flight instructor? This is just another unfunded mandate since TSA does not seem to want the responsibility to do a proper job itself. If an alien needs to learn to fly then simply have them 'cut the corner,' go directly to TSA, get the necessary approval from an agency that can 1) charge a fee commensurate with the work done, 2) has access to the necessary law enforcement and national security information and 3) removes the burden from the flight instructor or school.

Thank you - I urge you to not require flight instructors or flight schools to have a law enforcement responsibility.